

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2022 OCT -5 PM 3:16

UNITED STATES OF AMERICA,

Plaintiff,

vs.

- (1) CORDELL A. WASHINGTON,
aka "Corey"
aka "Dub"
aka "Bro"
(Counts 1, 2, 3, 4, 14, 17, 28, 29, 30, 32,
36, 37 and Forfeitures A, C, E, J, K)
- (2) PATRICK M. SAULTZ,
aka "White Boy Pat"
(Counts 1, 14, 17, 25, 26, 27, 30, 31, 32,
33 and Forfeitures B, C, I, J)
- (3) DAVID E. PRICE,
aka "DP"
(Counts 1, 5, 6, 7, 11, 24 and
Forfeitures D, E, J)
- (4) ALLISON E. SMITH,
aka "Alli"
(Counts 1, 23 and Forfeiture F)
- (5) TAVARYYUAN JOHNSON,
aka "Gucci"
aka "TJ"
(Counts 1, 21, 22, 34, 35, 36 and
Forfeitures G, K)
- (6) TYLER N. BOURDO,
(Counts 1, 8, 9, 10, 12, 18, 19, 20 and
Forfeitures H, J)
- (7) ALEXIS C. LEWIS,
(Counts 1, 17 and Forfeiture I)
- (8) MICHAEL D. FOWLER,
(Counts 1, 15)

CASE NO. 2:22-CR-117

JUDGE EDMUND A. SARGUS, JR.

SUPERSEDING INDICTMENT

18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(a)(8)
18 U.S.C. § 924(c)(1)(A)(i)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(ii)
21 U.S.C. § 841(b)(1)(A)(iii)
21 U.S.C. § 841(b)(1)(A)(vi)
21 U.S.C. § 841(b)(1)(B)(iii)
21 U.S.C. § 841(b)(1)(B)(vi)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 841(b)(1)(D)
21 U.S.C. § 841(b)(2)
21 U.S.C. § 846
21 U.S.C. § 856
21 U.S.C. § 860

FORFEITURE ALLEGATIONS

- (9) CARMELA BROOKS,
(Counts 1, 15).
- (10) DUSTIN A. SPEAKMAN
aka "Dawg"
(Counts 1, 16)
- (11) DANNY G. MULLINS,
(Count 1)
- (12) ANTHONY B. FRIERSON,
aka "Royal"
(Count 1)
- (13) MICHAEL D. BURTON,
(Counts 1, 38, 39, 40, 41 and
Forfeiture L)
- (14) BRIAN K. LONG II,
(Count 1)
- (15) CAITLIN R.S. DUFF,
(Count 1)
- (16) MITCHELL A. POWERS,
(Count 1)
- (17) VINCENT T. GRIFFIN,
(Count 1)
- (18) ROBERT L. PYLES,
aka "Pork"
(Count 1)
- (19) GABRIEL R. SMITH,
aka "Gabe"
(Count 1)
- (20) BRITTANY A. WILLIAMS,
(Count 1)
- (21) LAUREN E. BREZNY,
(Counts 1, 13)
- (22) PRISCILLA L. WASHINGTON, and
(Count 37 and Forfeiture K)

**(23) ROBERT E. TINSLEY III,
aka "Cam"
(Counts 1, 10)**

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl, Cocaine, Cocaine Base, Methamphetamine, Heroin, Marijuana, Alprazolam, and Oxycodone)

1. Between on or about January 1, 2008, through and including the date of this Superseding Indictment, in the Southern District of Ohio and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka "Corey," aka "Dub," aka "Bro," PATRICK M. SAULTZ, aka "White Boy Pat," DAVID E. PRICE, aka "DP," ALLISON E. SMITH, aka "Alli," TAVARYYUAN JOHNSON, aka "Gucci," aka "TJ," TYLER N. BOURDO, ALEXIS C. LEWIS, MICHAEL D. FOWLER, CARMELA BROOKS, DUSTIN A. SPEAKMAN, aka "Dawg," DANNY G. MULLINS, ANTHONY B. FRIERSON, aka "Royal," MICHAEL D. BURTON, BRIAN K. LONG II, CAITLIN R.S. DUFF, MITCHELL A. POWERS, VINCENT T. GRIFFIN, ROBERT L. PYLES, aka "Pork," GABRIEL R. SMITH, aka "Gabe," BRITTANY A. WILLIAMS, LAUREN E. BREZNY, and ROBERT E. TINSLEY III, aka "Cam,"** and others, both known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully conspire with each other and with others, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as "fentanyl," a Schedule II controlled substance; five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule

II controlled substance; 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance; a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance; a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance; a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance; and a mixture or substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi), 841(b)(1)(A)(ii), 841(b)(1)(A)(iii), 841(b)(1)(C), 841(b)(2), and 846.

2. It was a part of the conspiracy that **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,” and PATRICK M. SAULTZ, aka “White Boy Pat,”** were the leaders of a Drug Trafficking Organization (DTO) that received illegal controlled substances including, but not limited to fentanyl, cocaine, cocaine base, metamphetamine, heroin, marijuana, alprazolam, and oxycodone, and distributed the controlled substances in and around the central Ohio area.

3. It was further a part of the conspiracy that co-conspirators in this DTO utilized cellular phones and other communication devices and applications to discuss the delivery, storage, preparation, packaging, distribution, sale, and proceeds from the business of trafficking in illegal controlled substances.

4. It was further a part of the conspiracy that the co-conspirators utilized code words when discussing the importation, storage, preparation, packaging, distribution, sale, and proceeds from the business of trafficking in illegal controlled substances.

5. It was further a part of the conspiracy that the co-conspirators utilized residences for the sale of illegal controlled substances to users who arrived at the residences to purchase controlled substances.

6. It was further a part of the conspiracy that the co-conspirators stored drugs at and sold drugs from residences that are within 1,000 feet of the real property of a Columbus City School, that is Burroughs Elementary School, specifically, these residences were located at 559 S. Burgess Avenue, Columbus, Ohio and 505 S. Harris Avenue, Columbus, Ohio.

7. It was further a part of the conspiracy that each DTO residence was equipped with a cellular phone that stayed at the residence and many of the DTO's customers called that residence's cellular phone to inquire about visiting the residence in order to purchase illegal controlled substances.

8. It was further a part of the conspiracy that one member of the organization acted as a manager or seller at a residence being used for drug sales by answering the cellular phone and selling illegal controlled substances to customers who arrived to purchase illegal controlled substances, while others in the organization distanced themselves from the day-to-day sales.

9. It was further a part of the conspiracy that a co-conspirator purchased houses and storage facilities to use as stash houses to store the illegal controlled substances.

10. It was further a part of the conspiracy that the co-conspirators solicited persons to trade U.S. currency and/or illegal controlled substances for checks and money orders to deposit into accounts controlled by the co-conspirators in an attempt to launder their drug trafficking proceeds.

11. It was further a part of the conspiracy that the co-conspirators created fictitious Limited Liability Companies in order to open and maintain bank accounts to deposit their drug proceeds.

12. It was further a part of the conspiracy that this DTO supplied distribution amounts of illegal controlled substances, including but not limited to fentanyl, cocaine, cocaine base, methamphetamine, heroin, marijuana, alprazolam, and oxycodone to other drug distributors.

In violation of 21 U.S.C. §§ 846 and 860.

COUNT 2
(Distribution of Cocaine Base)

13. On or about December 17, 2020, in the Southern District of Ohio, the defendant, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,”** did knowingly, intentionally, and unlawfully distribute a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 3
**(Possession with Intent to Distribute Cocaine Base, Cocaine,
Fentanyl, Heroin, and Marijuana)**

14. On or about December 17, 2020, in the Southern District of Ohio, the defendant, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,”** did knowingly, intentionally, and unlawfully possess with intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance; a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; a mixture or substance containing a detectable amount

of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance; a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; and less than 50 kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii), 841(b)(1)(C), and 841(b)(1)(D), and 18 U.S.C. § 2.

COUNT 4

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

15. On or about December 17, 2020, in the Southern District of Ohio, the defendant, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,”** did knowingly possess one or more firearms, to wit, a High Standard, .22 caliber pistol, bearing serial number 690090; and a Ruger LC9S, 9mm pistol, bearing serial number 327-14814, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 3 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 5

(Possession with Intent to Distribute Cocaine and Fentanyl)

16. On or about August 4, 2021, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP,”** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; and a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 6

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

17. On or about August 4, 2021, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP,”** did knowingly possess one or more firearms, to wit, a Bryco Arms, 9mm pistol, bearing serial number 1509754; a Ruger SR22P, .22 caliber pistol, bearing serial number 363-74908; and a Jimenez Arms, Model J.A. 380, .380 caliber pistol, bearing serial number 091278, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine and fentanyl, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 5 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 7

(Felon in Possession of a Firearm)

18. On or about August 4, 2021, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP,”** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit, a Bryco Arms, 9mm pistol, bearing serial number 1509754; a Ruger SR22P, .22 caliber pistol, bearing serial number 363-74908; and a Jimenez Arms, Model J.A. 380, .380 caliber pistol, bearing serial number 091278, and those firearms were in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

COUNT 8

(Distribution of Fentanyl)

19. On or about September 8, 2021, in the Southern District of Ohio, the defendant, **TYLER N. BOURDO,** did knowingly, intentionally, and unlawfully distribute a mixture or

substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 9

(Possession with Intent to Distribute Fentanyl and Cocaine)

20. On or about September 17, 2021, in the Southern District of Ohio, the defendant, **TYLER N. BOURDO**, did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance, and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 10

(Distribution of Fentanyl and Cocaine Base Resulting in Serious Bodily Injury)

21. On or about October 10, 2021, in the Southern District of Ohio, the defendants, **TYLER N. BOURDO** and **ROBERT E. TINSLEY III, aka “Cam,”** did knowingly, intentionally, and unlawfully distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” and a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” Schedule II controlled substances. The serious bodily injury of “S.B.” resulted from the distribution of the controlled substances.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 11
(Distribution of Fentanyl)

22. On or about November 21, 2021, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP,”** did knowingly, intentionally, and unlawfully distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 12
(Distribution of Fentanyl and Cocaine)

23. On or about November 28, 2021, in the Southern District of Ohio, the defendant, **TYLER N. BOURDO,** did knowingly, intentionally, and unlawfully distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance, and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 13
(Possession with Intent to Distribute Fentanyl, Cocaine, and Methamphetamine)

24. On or about May 4, 2022, in the Southern District of Ohio, the defendant, **LAUREN E. BREZNY,** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance; a mixture or substance containing a detectable amount of cocaine, a

Schedule II controlled substance; and a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 14
(Distribution of Fentanyl)

25. On or about June 23, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON**, aka “Corey,” aka “Dub,” aka “Bro,” and **PATRICK M. SAULTZ**, aka “White Boy Pat,” did knowingly, intentionally, and unlawfully distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance, and they did so within 1,000 feet of the real property of a Columbus City School, to wit, Burroughs Elementary School.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 860, and 18 U.S.C. § 2.

COUNT 15
(Possession with Intent to Distribute Fentanyl)

26. On or about June 23, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **MICHAEL D. FOWLER** and **CARMELA BROOKS**, did knowingly, intentionally, and unlawfully possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance, and they did so within 1,000 feet of the real property of a Columbus City School, to wit, Burroughs Elementary School.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 860, and 18 U.S.C. § 2.

COUNT 16
(Possession with Intent to Distribute Cocaine Base)

27. On or about June 25, 2022, in the Southern District of Ohio, and elsewhere, the defendant, **DUSTIN A. SPEAKMAN, aka “Dawg,”** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 17
(Possession with Intent to Distribute Fentanyl)

28. On or about June 26, 2022, in the Southern District of Ohio, and elsewhere, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,” PATRICK M. SAULTZ, aka “White Boy Pat,” and ALEXIS C. LEWIS,** did knowingly, intentionally, and unlawfully possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance, and they did so within 1,000 feet of the real property of a Columbus City School, to wit, Burroughs Elementary School.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 860, and 18 U.S.C. § 2.

COUNT 18
(Possession with Intent to Distribute Fentanyl, Cocaine, and Cocaine Base)

29. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **TYLER N. BOURDO,** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance; a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled

substance; and a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 19

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

30. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **TYLER N. BOURDO**, did knowingly possess a firearm, to wit, a Glock, Model 27, 9mm pistol, bearing serial number AGBV081, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 18 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 20

(Felon in Possession of a Firearm)

31. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **TYLER N. BOURDO**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Glock, Model 27, 9mm pistol, bearing serial number AGBV081, and that firearm was in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 21

(Possession with Intent to Distribute Cocaine Base)

32. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,”** did knowingly, intentionally, and unlawfully possess with intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii), and 18 U.S.C. § 2.

COUNT 22

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

33. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,”** did knowingly possess a firearm, to wit, a Glock, Model 27, .40 caliber pistol, bearing serial number TGA231, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 21 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 23

(Possession with Intent to Distribute Fentanyl, Cocaine, Cocaine Base, and Methamphetamine, Alprazolam, and Oxycodone)

34. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **ALLISON E. SMITH, aka “Alli,”** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide, commonly referred to as “fentanyl,” a Schedule II

controlled substance; a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance; a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance; a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance; and a mixture or substance containing a detectable amount of alprazolam, a Schedule IV controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(2), and 18 U.S.C. § 2.

COUNT 24
(Possession with Intent to Distribute Cocaine)

35. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **DAVID E. PRICE, aka “DP,”** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 25
(Possession with Intent to Distribute Cocaine Base)

36. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **PATRICK SAULTZ, aka “White Boy Pat,”** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 26

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

37. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **PATRICK SAULTZ, aka “White Boy Pat,”** did knowingly possess a firearm, to wit, a Ruger, Model 57, 5.7 x 28mm pistol, bearing serial number 641-60669, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 25 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 27

(Felon in Possession of a Firearm)

38. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **PATRICK SAULTZ, aka “White Boy Pat,”** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Ruger, Model 57, 5.7 x 28mm pistol, bearing serial number 641-60669, and that firearm was in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 28

(Possession with Intent to Distribute Fentanyl and Cocaine Base)

39. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,”** did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance; and a mixture or substance containing

a detectable amount of cocaine base, commonly referred to as “crack,” a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 29

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

40. On or about June 29, 2022, in the Southern District of Ohio, the defendant, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,”** did knowingly possess a firearm, to wit, a Smith & Wesson 9mm pistol, bearing serial number NCK9689, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute fentanyl and cocaine base, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 28 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 30

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

41. On or about June 30, 2022, in the Southern District of Ohio, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,” and PATRICK SAULTZ, aka “White Boy Pat,”** did knowingly possess one or more firearms, to wit: a Remington Wingmaster 870 shotgun, bearing serial number S635855V; a Sears Roebuck Model 21 shotgun, bearing no serial number; a Mauser K98 rifle, bearing serial number 9130256982; a Mossberg 930 shotgun, bearing serial number AF116053; a Winchester 94 rifle, bearing serial number 4547097; a Kel-Tec PLR 16 pistol, with scope, bearing serial number P8J10, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United

States, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, as alleged in Count 1 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 31
(Felon in Possession of a Firearm)

42. On or about June 30, 2022, in the Southern District of Ohio, the defendant, **PATRICK SAULTZ, aka “White Boy Pat,”** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: a Remington Wingmaster 870 shotgun, bearing serial number S635855V; a Sears Roebuck Model 21 shotgun, bearing no serial number; a Mauser K98 rifle, bearing serial number 9130256982; a Mossberg 930 shotgun, bearing serial number AF116053; and a Winchester 94 rifle, bearing serial number 4547097; a Kel-Tec PLR 16 pistol, with scope, bearing serial number P8J10, and those firearms were in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 32
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

43. On or about June 30, 2022, in the Southern District of Ohio, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,”** and **PATRICK SAULTZ, aka “White Boy Pat,”** did knowingly possess a firearm, to wit, a Smith & Wesson M&P 2.0 pistol, bearing serial number NCL4076, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute and

possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, as alleged in Count 1 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 33
(Felon in Possession of a Firearm)

44. On or about June 30, 2022, in the Southern District of Ohio, the defendant, **PATRICK SAULTZ, aka “White Boy Pat,”** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Smith and Wesson M&P 2.0 pistol, bearing serial number NCL4076, and that firearm was in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 34
(Possession with Intent to Distribute Fentanyl and Cocaine)

45. Between in or about May 2022 through July 1, 2022, in the Southern District of Ohio, the defendant, **TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,”** did knowingly, intentionally, and unlawfully possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as “fentanyl,” a Schedule II controlled substance; and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 35

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

46. Between in or about May 2022 through July 1, 2022, in the Southern District of Ohio, the defendant, **TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,”** did knowingly possess one or more firearms, to wit, A .45 caliber Taurus PT145 pistol, bearing Serial Number NCU68899; a Taurus PT24/7 9mm pistol, bearing Serial Number NAR16534, a Beretta Px4 Storm 9mm pistol, bearing Serial Number PX4 PZ1310D, a C.A.I. (Century Arms), Model: PA-63, Caliber: 9mm Makarov, Serial Number: AG4689, a Sig Sauer, Model: P320, Caliber: 9mm, Serial Number: 58C131902, and a Springfield, Model: XD-40, Caliber: .40, Serial Number: US477570, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, possession with intent to distribute fentanyl and cocaine, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 34 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 36

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

47. Between in or about May 2022 through July 1, 2022, in the Southern District of Ohio, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro,” and TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,”** did knowingly possess one or more firearms, to wit, a CZ Scorpion pistol, bearing Serial Number C952539; an Anderson AM15 rifle, bearing Serial Number 15020490; an Intratec 9mm Mod AB-10 pistol, bearing Serial Number A017639; a Yugoslavian 59/66 rifle, bearing Serial Number J-354260; an Anderson AM-16 rifle, bearing Serial Number 15281454; a Glock 23C pistol, bearing Serial Number ABRW497; a Glock 21 pistol, bearing Serial Number DNR511US; a RomArm Draco AR47 pistol, bearing Serial Number DB-0819-16RO; a Century Arms VSKA rifle, bearing Serial Number SV7005393; a

RomArm micro draco pistol, bearing Serial Number PMD-0562418RO; a Ruger Super Redhawk revolver, bearing Serial Number 55147343; a Smith and Wesson M&P Shield pistol, bearing Serial Number HKY7806; a Walther 9mm pistol, bearing Serial Number FAN8218; an Armi GT27 pistol, bearing Serial Number M57005; a Ruger 10/22 rifle, bearing Serial Number 821-03941; a Bushmaster rifle, bearing Serial Number BFI659961; a Mossberg 88 shotgun, bearing Serial Number MV51813V; a Romarm SAR-1 rifle, bearing Serial Number S1-57119-2002; a Marlin 30-30 rifle, bearing Serial Number 95002559; a GSG S22 rifle, bearing Serial Number A564876; a Western Field M550AD shotgun, bearing no Serial Number; a New England 17 HMR rifle, bearing Serial Number NV227057; a Bond Arms Colt 45 pistol, bearing Serial Number 83973; a Taurus PT24/7 pistol, bearing Serial Number NAR16534; a Smith and Wesson M&P pistol, bearing Serial Number HRD9611; a Taurus pistol, bearing Serial Number TIM21658; and an F.lli Pietta PN pistol, bearing Serial Number 401511, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, as alleged in Count 1 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 37
(Maintaining a Drug Involved Premise)

48. Between in or about May 2022 through July 1, 2022, in the Southern District of Ohio, the defendant, **PRISCILLA L. WASHINGTON**, did unlawfully and knowingly manage and control a residence as an owner, lessee, occupant, or mortgagee, and did knowingly and intentionally rent, lease, profit from, or make available for use said residence, with or without

compensation, for the purpose of unlawfully manufacturing, storing, distributing, or using a controlled substance.

In violation of 21 U.S.C. § 856(a)(2).

COUNT 38
(Possession with Intent to Distribute Methamphetamine)

49. On or about August 3, 2022, in the Southern District of Ohio, the defendant, **MICHAEL D. BURTON**, did knowingly, intentionally, and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 39
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

50. On or about August 3, 2022, in the Southern District of Ohio, the defendant, **MICHAEL D. BURTON**, did knowingly possess a firearm, to wit, an FN Herstal 5.7 x 28 caliber pistol, bearing serial number 386371429, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute methamphetamine, in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 38 of this Superseding Indictment.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

COUNT 40
(Felon in Possession of a Firearm)

51. On or about August 3, 2022, in the Southern District of Ohio, the defendant, **MICHAEL D. BURTON**, knowing he had previously been convicted of a crime punishable by

imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, an FN Herstal 5.7 x 28 caliber pistol, bearing serial number 386371429, and that firearm was in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 41
(Felon in Possession of a Firearm)

52. On or about August 1, 2022, in the Southern District of Ohio, the defendant, **MICHAEL D. BURTON**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit, a Smith & Wesson, M&P Shield, 9mm pistol, bearing serial number LEV0738; and a Ruger EC9S, 9mm pistol, bearing serial number 45486947, and those firearms were in and affecting interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

FORFEITURE A

53. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

54. Upon conviction of any offense alleged in this Superseding Indictment, the defendant, **CORDELL A. WASHINGTON**, aka “Corey,” aka “Dub,” aka “Bro,” shall forfeit to the United States all of his right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any

property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to:

1. The following property seized on or about December 17, 2020, from the residence located at 715 South Burgess, Columbus, Ohio:
 - A High Standard, .22 caliber pistol, bearing serial number 690090;
 - A Ruger LC9S, 9mm pistol, bearing serial number 327-14814; and
 - All ammunition and magazines.
2. The following property seized on or about June 29, 2022, from the residence located at 150 Balderson Drive, Pickerington, Ohio:
 - A Smith and Wesson 9mm firearm, bearing serial number NCK9689;
 - All magazines and ammunition;
 - Approximately \$10,795.00 in United States currency, which includes:
 - Approximately \$10,255.00 in United States currency seized from the master bedroom in the residence; and
 - Approximately \$540.00 seized from a wallet found in the residence which also held an identification card for Cordell Washington; and
 - A diamond plated Rolex watch;
 - A diamond ring;
 - A Rolex watch held in a box;
 - Gold and diamond earrings; and
 - Diamond earrings.
3. A red 1988 Chevrolet Monte Carlo, VIN 1G1GZ11G3JP109009, last known to display Ohio license JTH9187, titled in the name of Cordell A. Washington;
4. A gray 2015 GMC Yukon, VIN 1GKS2HKC4FR168967, last known to display Ohio license JCV9389, titled in the name of Cordell A. Washington;
5. A gray 2015 Acura MDX, VIN 5FRYD4H89FB024895, last known to display Ohio license JDB3028, titled in the name of Cordell A. Washington; and
6. A black 2017 Cadillac Escalade, VIN 1GYS4HKJ1HR127391, last known to display Ohio license JTB3900, titled in the name of Rebecca M. Washington.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE B

55. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

56. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment, the defendant, **PATRICK M. SAULTZ, aka “White Boy Pat,”** shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all of his right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s), and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation(s), including, but not limited to, the following:

1. A black 2019 BMW 7 Series, VIN WBA7F2C56KB239637, last known to display Ohio license O031151, titled in the name of Patrick M. Saultz;
2. A black 1986 Buick Regal, VIN 1G4GK4772GP458025, last known to display Ohio license 295ZKR, titled in the name of Patrick M. Saultz;
3. A teal Harley Davidson Road Glide motorcycle, VIN 1HD1KTM11FB611217, last known to display Ohio license HYS59, titled in the name of Ashley R. Morrison (Ashley Saultz); and
4. Approximately \$71,730.27 seized on or about July 11, 2022, from JP Morgan Chase Checking Account xxxx6895, held in the name of Patrick Saultz, pursuant to a federal seizure warrant.

Forfeiture notice pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE C

57. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

58. Upon conviction of any offense alleged in this Superseding Indictment, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro and PATRICK M. SAULTZ, aka “White Boy Pat,”** shall forfeit to the United States all of their right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to:

1. The following property seized on or about June 30, 2022, from Car-Go Storage, Unit S14:
 - A Remington Wingmaster 870 shotgun, bearing serial number S635855V;
 - A Sears Roebuck Model 21 shotgun, bearing no serial number;
 - A Mauser K98 rifle, bearing serial number 9130256982;
 - A Mossberg 930, shotgun, bearing serial number AF116053;
 - A Winchester 94 rifle , bearing serial number 4547097;
 - A Kel-Tec PLR 16 pistol, with scope, and bearing serial number P8J10; and
 - All magazines and ammunition.
2. The following property seized on or about June 30, 2022, from Car-Go Storage, Unit T15:
 - Approximately \$895,300.00 in United States currency; and
 - A Rolex Oyster Perpetual Datejust watch held in a green box.
3. The following property seized on or about June 30, 2022, from Car-Go Storage, Unit O19:
 - A Smith and Wesson M&P 2.0 pistol, bearing serial number NCL4076;

- All magazines and ammunition; and
 - Approximately \$325,040 in United States currency.
4. Approximately \$112,646.18 seized on or about July 11, 2022, from Huntington Bank Business Checking Account xxxx3720, held in the name of Ohio P&C Properties, LLC, pursuant to a federal seizure warrant.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE D

59. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

60. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment, the defendant, **DAVID E. PRICE, aka “DP,”** shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all of his right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including, but not limited to, a black 2015 Chevrolet Tahoe, VIN 1GNSKBKC5FR145567, last known to display Ohio license JDN2395, titled in the name of David Price.

Forfeiture notice pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE E

61. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

62. Upon conviction of any offense alleged in this Superseding Indictment, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro and DAVID E. PRICE, aka “DP,”** shall forfeit to the United States all of their right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to, the following property seized on or about August 4, 2021, from the residence located at 139 South Princeton Avenue, Columbus, Ohio:
 1. A Jimenez Arms .380 caliber pistol, bearing serial number 091278;
 2. A Bryco Arms 9mm pistol, bearing serial number 1509754;
 3. A Ruger .22 caliber pistol, bearing serial number 363-74908;
 4. All magazines and ammunition; and
 5. Approximately \$9,701.00 in United States currency.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE F

63. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

64. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment, the defendant, **ALLISON E. SMITH, aka “Alli,”** shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all of her right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or

indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including, but not limited to, approximately \$8,386.00 in United States currency seized on or about June 29, 2022, from the residence located at 505 South Harris Avenue, Columbus, Ohio.

Forfeiture notice pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE G

65. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

66. Upon conviction of any offense alleged in this Superseding Indictment, the defendant, **TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,”** shall forfeit to the United States all of his right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to, the following property seized on or about June 29, 2022, from the residence located at 430A South Warren, Columbus, Ohio:
 1. A loaded Glock 27 firearm, bearing serial number TGA261;
 2. All magazines and ammunition;
 3. Approximately \$44,061.00 in United States currency, which includes:
 - Approximately \$36,132.00 in United States currency seized from inside the residence;

- Approximately \$6,914.00 seized from Tavaryyuan Johnson's pants pockets at the time of his arrest at the residence; and
- Approximately \$1,015.00 in United States currency seized from a purse found in the residence; and

4. Approximately \$342.00 in United States currency.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE H

67. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

68. Upon conviction of any offense alleged in this Superseding Indictment, the defendant, **TYLER N. BOURDO**, shall forfeit to the United States all of his right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to,

1. The following property seized on or about June 29, 2022, from the residence located at 430B South Warren, Columbus, Ohio:
 - A loaded Glock 27 firearm, bearing serial number AGBV081;
 - All magazines and ammunition; and
 - Approximately \$4,660.40 in United States currency.

2. A white 2017 BMW 5 Series, VIN WBAJA5C30HG894683, last known to display Ohio license JAL3947, titled in the name of William Vladimir Denega.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE I

69. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

70. Upon conviction of any offense alleged in this Superseding Indictment, the defendants, **PATRICK M. SAULTZ, aka “White Boy Pat,” and ALEXIS C. LEWIS**, shall forfeit to the United States all of their right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to, the following property seized on or about June 29, 2022, from the residence located at 140 Whitethorne Avenue, Columbus, Ohio:
 1. A Ruger -57 pistol, bearing serial number 641-60669;
 2. All magazines and ammunition;
 3. Approximately \$100,577.00 in United States currency, which includes:
 - Approximately \$95,577.00 in United States currency seized from inside the residence; and
 - Approximately \$5,000.00 in United States currency seized from the 2019 black BMW located at the residence; and

4. A Rolex watch.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE J

71. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

72. Upon conviction of any offense alleged in this Superseding Indictment, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro, PATRICK M. SAULTZ, aka “White Boy Pat,” DAVID E. PRICE, aka “DP,” and TYLER N. BOURDO,** shall forfeit to the United States all of their right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to, the following property seized on or about February 17, 2022, from the residence located at 634 South Ogden Avenue, Columbus, Ohio:
 1. A Smith and Wesson, US M&P P9 handgun, bearing serial number NBL1170;
 2. All magazines and ammunition; and
 3. Approximately \$2,668.00 in United States currency.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE K

73. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

74. Upon conviction of any offense alleged in this Superseding Indictment, the defendants, **CORDELL A. WASHINGTON, aka “Corey,” aka “Dub,” aka “Bro, TAVARYYUAN JOHNSON, aka “Gucci,” aka “TJ,” and PRISCILLA L. WASHINGTON,** shall forfeit to the United States all of their right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 and/or or 21 U.S.C. § 856, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to, the following property seized on or about July 1, 2022, from the residence located at 1214 Smith Road, Columbus, Ohio:

1. A CZ Scorpion pistol, bearing serial number C952539;
2. An Anderson AM15 rifle, bearing serial number 15020490;
3. An Intratec 9mm Mod AB-10 pistol, bearing serial number A017639;
4. A Yugoslavian 59/66 rifle, bearing serial number J-354260;
5. An Anderson AM-16 rifle, bearing serial number 15281454;
6. A Glock 23C pistol, bearing serial number ABRW497;
7. A Glock 21 pistol, bearing serial number DNR511US;
8. A RomArm Draco AR47 pistol, bearing serial number DB-0819-16RO;
9. A Century Arms VSKA rifle, bearing serial number SV7005393;
10. A RomArm micro draco pistol, bearing serial number PMD-0562418RO;

11. A Ruger Super Redhawk revolver, bearing serial number 55147343;
12. A Smith and Wesson M&P Shield pistol, bearing serial number HKY7806;
13. A Walther 9mm pistol, bearing serial number FAN8218;
14. An Armi GT27 pistol, bearing serial number M57005;
15. A Ruger 10/22 rifle, bearing serial number 821-03941;
16. A Bushmaster rifle, bearing serial number BFI659961;
17. A Mossberg 88 shotgun, bearing serial number MV51813V;
18. A Romarm SAR-1 rifle, bearing serial number S1-57119-2002;
19. A Marlin 30-30 rifle, bearing serial number 95002559;
20. A GSG S22 rifle, bearing serial number A564876;
21. A Western Field M550AD shotgun, bearing no serial number;
22. A New England 17 HMR rifle, bearing serial number NV227057;
23. A Bond Arms Colt 45 pistol, bearing serial number 83973;
24. A Taurus PT145 pistol, bearing serial number NCU68899;
25. A Taurus PT24/7 pistol, bearing serial number NAR16534;
26. A Smith and Wesson M&P pistol, bearing serial number HRD9611;
27. A Taurus pistol, bearing serial number TIM21658;
28. A Beretta pistol, bearing serial number PX4 PZ1310D;
29. An F.lli Pietta PN pistol, bearing serial number 401511;
30. An FEG CAI PA-63 pistol, bearing serial number AG4689;
31. A Sig Sauer pistol, bearing serial number 58C131902;
32. A Springfield XD firearm, bearing serial number US477570;
33. Assorted magazines and ammunition; and
34. Approximately \$123,127.00 in United States currency, which includes:
 - Approximately \$101,410.00 in United States currency seized from a safe located in the basement of the residence;
 - Approximately \$4,702.00 in United States currency seized from the master bedroom in the residence; and
 - Approximately \$17,015.00 in United States currency seized from a crawl space found in the basement of the residence.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE L

75. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.

76. Upon conviction of any offense alleged in this Superseding Indictment, the defendant, **MICHAEL D. BURTON**, shall forfeit to the United States all of his right, title, and interest in:

- a. all firearms and ammunition involved in or used in such offense, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or
- b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2), including, but not limited to, the following:
 1. The following property seized on or about August 3, 2022, from 3183 Carlee Drive, Columbus, Ohio:
 - A loaded FN (FN Herstal) 5.7 x 28 semi-automatic handgun, bearing serial number 386371429;
 - All magazines and ammunition; and
 - Approximately \$20,230.00 in United States currency.
 2. The following property seized on or about August 3, 2022, from 961 Cliff Creek Drive, Columbus, Ohio:
 - A loaded Smith & Wesson M&P Shield 9, 9mm handgun, bearing serial number LEV0738;
 - A loaded Ruger EC9S, 9mm handgun, bearing serial number 45486947;
 - All magazines and ammunition; and
 - Approximately \$12,681.00 in United States currency.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

SUBSTITUTE ASSETS

77. If any of the forfeitable property described in this Superseding Indictment, as a result of any act or omission of any defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property belonging to that defendant up to the value of the above forfeitable property.

A TRUE BILL

s/Foreperson
FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY


TIMOTHY D. PRICHARD (0059455)
Assistant United States Attorney


EMILY CZERNIEJEWSKI (IL 6308829)
Assistant United States Attorney